

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT BROWN and THE ESTATE OF BOBBI)	
KRISTINA BROWN)	
)	
Plaintiffs)	Action No.
)	<u>1:17-cv-06824-AT</u>
v.)	
)	
)	
TV ONE LLC, SWIRL RECORDING & FILM INC.)	
D/B/A SWIRL FILMS, INC., TRACEY BAKER-)	
SIMMONS, WANDA SHELLEY and B2)	
ENTERTAINMENT LLC and SIMMONS SHELLEY)	
ENTERTAINMENT, LLC.)	
Defendants)	

AFFIDAVIT OF CHRISTOPHER BROWN

I, Christopher Brown ("Brown") state under the pains and penalty of perjury:

1. I am member of the Law firm Brown & Rosen LLC.
2. In 2015, I was counsel in the Bobbi Kristina Brown Probate matter in Georgia for Robert Brown along with Attorney Robert Turner.
3. Tracey Baker Simmons ("Simmons"), while a resident and/or working in New York, was noticed for a deposition in the Probate matter in 2015 by the law firm of Greenberg Traurig LLP. See Exhibit "A".
4. Simmons may have received and/or had access to confidential sealed documents and/or information associated with Bobbi Kristina Brown.

5. Upon information and belief, Simmons appeared for her deposition on or about May 6, 2015.

Signed Under The Pains and Penalty of Perjury

A handwritten signature in black ink, appearing to read "CB", is written over a light blue rectangular background. Below the signature is a solid black horizontal line.

Christopher Brown

Dated: September 28, 2017

EXHIBIT A

IN THE PROBATE COURT
COUNTY OF DEKALB
STATE OF GEORGIA

IN RE:)
) CASE NO. 2015-0624
BOBBI KRISTINA BROWN)
PROPOSED WARD.)

NOTICE OF VIDEOCONFERENCING VIDEOTAPED DEPOSITION OF
TRACEY BAKER-SIMMONS

TO: Tracey Baker-Simmons
HFC Productions, LLC
100 Avenue of the Americas
Suite 3-32
New York, NY 10013

PLEASE TAKE NOTICE that, pursuant to Uniform Probate Rule 7.3 and other relevant authority, Petitioner Marion Pat Houston will take the deposition of Tracey Baker-Simmons, on Wednesday, May 6, 2015 at 2:00 p.m. via videoconference. The deposition will take place at Greenberg Traurig, LLP, 333 S.E. 2nd Avenue, Suite 4400, Miami, Florida 33131. The videoconference site in Georgia will be located at Greenberg Traurig, LLP, 3333 Piedmont Road NE, Suite 2500, Atlanta, Georgia 30305.

This deposition will be taken for the purpose of discovery, for uses at hearing and at trial, and for other such purposes permitted under the Georgia Civil Practice Act and will continue from time to time until completed. The deposition will be recorded by sound, video and stenographic means and will be taken before a Court Reporter and Notary Public who is authorized to administer oaths under the laws of the State of Georgia.

[Signature on following page]

Respectfully submitted this 4th day of May, 2015.



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**IN THE PROBATE COURT
COUNTY OF DEKALB
STATE OF GEORGIA**


IN RE:)	
)	CASE NO. 2015-0624
BOBBI KRISTINA BROWN)	
PROPOSED WARD.)	

CERTIFICATE OF SERVICE

This is to certify that on this 4th day of May, 2015, I served a true and correct copy of the foregoing **NOTICE OF VIDEOCONFERENCING VIDEOTAPED DEPOSITION OF TRACEY BAKER-SIMMONS** by electronic mail and by U.S. Mail First-Class to the following:

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Attorney for Petitioner Marion Pat Houston

